

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DONALD P. BOLAND and MARY A. : Civil Action No. 1:16-cv-03925-LLS
BOLAND, Individually and on Behalf of All :
Others Similarly Situated, : CLASS ACTION
Plaintiffs, : LEAD PLAINTIFF'S NOTICE OF MOTION
vs. : AND UNOPPOSED MOTION FOR
GERDAU S.A., et al., : PRELIMINARY APPROVAL OF
Defendants. : SETTLEMENT
:

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TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the Stipulation of Settlement with exhibits, and all prior pleadings and proceedings had herein, Lead Plaintiff, by and through its attorneys, hereby moves the Court, before the Honorable Louis L. Stanton, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for entry of the [Proposed] Order Preliminarily Approving Settlement and Providing for Notice, agreed upon by all parties: (1) granting preliminary approval of the proposed settlement; (2) certifying the Class solely for settlement purposes; (3) approving the form and manner of giving notice of the proposed

settlement to the Class; and (4) setting a hearing date for final approval thereof, and a schedule for various deadlines relevant thereto.

DATED: July 6, 2017

Respectfully submitted,

s/ Samuel H. Rudman

Samuel H. Rudman
David A. Rosenfeld
ROBBINS GELLER RUDMAN
& DOWD LLP
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)
srudman@rgrdlaw.com
drosenfeld@rgrdlaw.com

Henry Rosen
Ellen Gusikoff Stewart
Susannah R. Conn
ROBBINS GELLER RUDMAN
& DOWD LLP
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)
henryr@rgrdlaw.com
elleng@rgrdlaw.com
sconn@rgrdlaw.com

Christopher C. Gold
ROBBINS GELLER RUDMAN
& DOWD LLP
120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
Telephone: 561/750-3000
561/750-3364 (fax)
cgold@rgrdlaw.com

Lead Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, Samuel H. Rudman, hereby certify that on July 6, 2017, I caused a true and correct copy of the attached:

Lead Plaintiff's Notice of Motion and Unopposed Motion for Preliminary Approval of Settlement

to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filings to all counsel registered to receive such notice.

s/ Samuel H. Rudman

SAMUEL H. RUDMAN